

In particular, the Applicant has amended claim 1 to clarify the differences between the motion control system of claim 1 and the camera controller 1017 disclosed in the Sato reference. As amended claim 1 emphasizes that the claimed system transfers a hardware independent service request between a client application and at least one of a plurality of supported motion control systems. In this context, the motion control system comprises a motion services module that converts hardware independent service request methods into at least one hardware dependent motion command. The amendment to claim 1 further specifies that a format of the hardware dependent motion command is determined based on a selected motion control system from the group of supported motion control systems.

The amendments to claim 1 thus specify that motion services module establishes a level of hardware independence isolates the service request format module from the specifics of the supported motion control systems. In this context, the user of the system recited in claim 1 can select any one (or more) motion control system from the plurality of supported motion control systems; the isolation provided by the motion services module allows any one of the supported motion control systems to be used without any change to the client build module and/or service request format module. The user may thus substitute any one or more of the supported motion control systems for any of the other supported motion control systems.

In contrast, nothing in the Sato reference discloses, teaches, or suggests that the camera controller 1017 recited therein performs the function of the motion control system as recited in claim 1. To the contrary, the Applicant respectfully submits that the description of the camera controller 1017 suggests to one of ordinary skill in the art that this module is written to generate control signals specific to the hardware of the video camera 1003 being controlled. The Applicant respectfully submits that nothing in the Sato reference discloses, teaches, or suggests that this camera controller 1017 establishes a layer of hardware independence or that this controller be modified to be independent of the hardware of the video camera 1003.

The structure of the claimed invention thus differs from the structure taught by the Sato reference in that the Sato reference does not recite a motion services module that determines a format of at least one hardware dependent motion command based on a motion control system selected from a plurality of supported motion control systems. The Applicant respectfully submits that the claimed invention is superior in operation to the system taught by the Sato reference because the operator can, for example, at any time substitute one of the supported motion control systems for another of the motion control systems. This architecture allows the operator the ability to change vendors of the motion control systems without changing the entire system.

Given the foregoing, the Applicant respectfully submits that the amendments to claim 1 distinguish the invention recited therein over the teachings of the Sato reference. The Applicant thus respectfully requests withdrawal of the rejection of claim 1 under 35 USC § 102 based on the Sato reference and allowance of claim 1. Claims 2-12 further define claim 1 and should also be in condition for allowance.

The Applicant takes this opportunity to add claims 13-24, which defines the motion services module in a slightly different manner. In particular, claim 13 recites that the hardware independent service request method conforms to a programming interface common to all of the supported motion control systems. In this case, the motion services module can convert any hardware independent service request method conforming to this common programming interface into a hardware dependent motion command appropriate to any one of the supported motion control systems. Like claim 1 described above, the user of the system recited in claim 13 can select any one (or more) motion control system from the plurality of supported motion control systems. The motion services module allows any one of the supported motion control systems to be used without any change to the client build module and/or service request format module.

The Applicant thus respectfully submits that the invention recited in claim 13 is superior in operation to the system taught by the Sato reference for generally the same reasons recited above with respect to claim 1. Claims 14-24 further define claim 13 and also should be in condition for allowance.

Enclosed herewith as Exhibit A is a document entitled Listing of All Amendments and Claims (12-21-2005) containing the amendments to the specification and claims. Exhibit A contains the text of each pending claim, along with any amendments made hereby (illustrated using strikethrough and underlining) and the status of each pending claim.

Given the foregoing, the Applicant respectfully submits that claims 1-24 are in condition for allowance, and such allowance is respectfully requested. If there is any matter which could be expedited by consultation with the Applicant's attorney, such would be welcome. The Applicant's attorney can normally be reached at the telephone number below.

Signed at Bellingham, County of Whatcom, State of Washington this 21st day of
December, 2005.

Respectfully submitted,

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CERTIFICATE OF MAILING

37 C.F.R. §1.8

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